

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN, Individually and)
on Behalf of All other persons similarly)
situated,)

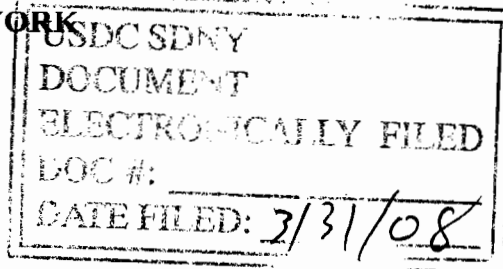
Plaintiffs,)

v.)

CITIGROUP INC.)
CITIGROUP TECHNOLOGY, INC.)
Defendants.)

Judge Hellerstein

Case No. 07 CIV 3769



**JOINT STIPULATION AND ORDER REGARDING
PLAINTIFF'S SUBMISSION OF CORRECTED FILINGS
AND DEFENDANTS' EXTENSION OF TIME TO FILE REPLY BRIEF**

WHEREAS on February 22, 2008, Defendants submitted their motion for summary judgment and accompanying Rule 56.1 Statement ("Defendant's Rule 56.1 Statement");

WHEREAS on March 14, 2007, Plaintiff submitted his opposition to Defendants' motion for summary judgment ("Opposition Brief") and accompanying Rule 56.1 Statement ("Plaintiff's Rule 56.1 Statement");

WHEREAS on March 24, 2008, Defendants informed Plaintiff that Plaintiff never served Defendants with a full copy of his Opposition Brief. Specifically, he did not electronically file or serve Defendants with page 29 of his Opposition Brief. Defendants requested that Plaintiff serve them with a full copy of the Opposition Brief and correct their filing of the brief;

WHEREAS on March 24, 2008, Plaintiffs filed a corrected Opposition Brief, and the corrected brief appears on the docket as Docket Number 38;

WHEREAS on March 24, 2008, Defendants also informed Plaintiff that Plaintiff skipped a paragraph when responding to Defendants' Rule 56.1 Statement. Specifically, Defendants'

Rule 56.1 Statement had 89 paragraphs, but Plaintiff's Rule 56.1 Statement only had 88 paragraphs. Defendants requested that Plaintiff file a corrected Rule 56.1 Statement;

WHEREAS on March 24, 2008 Defendants requested that Plaintiff grant Defendants a one week extension from the time that Plaintiff filed a corrected Rule 56.1 Statement to submit a reply brief in further support of their motion for summary judgment. Plaintiff agreed not to oppose any request from Defendants for an extension of time;

WHEREAS on March 25, 2008, Defendants wrote to the Court and requested a one week extension from the time that Plaintiff filed a corrected Rule 56.1 Statement to submit a reply brief in further support of their motion for summary judgment;

WHEREAS on March 25, 2008, Plaintiff filed a corrected Rule 56.1 Statement, and the corrected Rule 56.1 Statement appears on the docket as Docket No. 39;

WHEREAS on March 26, 2008, the Court filed an endorsed letter and instructed the parties to submit a stipulation for an order that permitted Plaintiff to file a correct Opposition Brief and Rule 56.1 Statement and permitted Defendant to have a one week extension from the time that Plaintiff filed a corrected Rule 56.1 Statement to submit a reply brief in further support of their motion for summary judgment;

WHEREAS pursuant to the Court's March 26, 2008 endorsed letter, IT IS HEREBY STIPULATED AND AGREED by and between the parties in this matter that:

1. Plaintiff shall be entitled to file a corrected Opposition Brief, and Plaintiff's original Opposition Brief (Docket No. 35) shall be replaced with Docket Number 38.
2. Plaintiff shall be entitled to file a corrected Rule 56.1 Statement, and Plaintiff's original Rule 56.1 Statement (Docket No. 35-1) shall be replaced with Docket No. 39.

3. Defendants shall submit their reply brief in further support of their motion for summary judgment by April 1, 2008.

Dated: New York, New York
March 28, 2008

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Sarah E. Bouchard
Samuel S. Shaulson
101 Park Avenue
New York, NY 10178
(212) 309-6000

Sarah E. Bouchard
Sarah E. Pontoski
1701 Market Street
Philadelphia, PA 19103
(215) 963-5000

Attorneys for Defendant


Dated: New York, New York
March 28, 2008

LOCKS LAW FIRM, PLLC

By: /s/ Fran L. Rudich
Fran L. Rudich (FR 7577)
Seth R. Lesser (SL 5560)
110 East 55th Street, 12th Floor
New York, New York 10022
(212) 838-3333

Jeffrey M. Gottlieb (JG 7905)
BERGER & GOTTLIEB
150 East 18th Street, Suite PHR
New York, New York 10003
(212) 228-9795

Attorneys for Plaintiff


SO ORDERED